

REMARKS

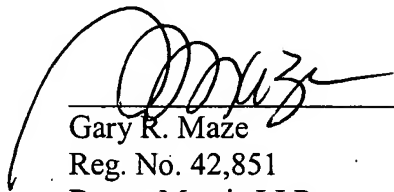
All the objected to claims have been put into allowable condition by rewriting claims 5, 10,13,14 and 20 into independent form.

The Examiner rejected claim 1 as anticipated over Mackay USP 6,655,459. Mackay uses a sleeve 150 that in some embodiments is removable after cementing and before the next string is expanded into a recess best shown in Figure 3. There is an annular space 155 between the sleeve 150 and the enlarged diameter that defines the annular space 155. Column 5 lines 13-27 teaches an aperture in the sleeve for pressure equalization during run in. Claims 1 and 11 feature a compliant sleeve that accomplishes this feature. The use of a compliant sleeve allows any fluid or material to be better retained in the annular space as opposed to a hole in the sleeve that will either let the annular space contents run out or, worse still, allow sand 122 in, or that can plug causing the sleeve to get prematurely displaced or to fail. More particularly to claims 1 and 11 a compliant sleeve is a more reliable way to equalize pressure during run in regardless of any contents in the annular space. It is clear that the reference that combines an aperture in the sleeve 150 adjacent the sand 122 will allow sand migration against the larger diameter and that could damage the surface or prevent a good seal on expansion of the next string into the sleeve 150 when trying to close up the annular space.

Claims 1 and 11 and the claims that depend on them are not anticipated by Mackay.

Respectfully submitted,

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